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Attorneys for LESLIE KLEIN & ASSOCIATES,
INC., and EKLK FOUNDATION

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
Los Angeles Division

IN RE LESLIE KLEIN,

Debtor,

BRADLEY D. SHARP, CHAPTER 11
TRUSTEE,

Plaintiff,

v.

LESLIE KLEIN, an individual,
THE SECOND AMENDED KLEIN LIVING
TRUST, a trust,
THE MARITAL DEDUCTION TRUST OF
ERIKA KLEIN, a trust,
THE SURVIVOR'S TRUST OF LESLIE
KLEIN, a trust, and
BARBARA KLEIN, an individual,

Defendants.

Case No.: 2:23-bk-10990-SK

Adv. Case No.: 2:24-ap-01140-SK

Chapter 11

Hon. NEIL W. BASON

**DECLARATION OF DEBTOR LESLIE
KLEIN IN OPPOSITION TO APPLICATION
FOR COMPENSATION BY TRUSTEE AND
COUNSEL**

Previous Hearing Date: June 3, 2025

Time: 1:00 p.m.

Courtroom: 1575

255 East Temple Street
Los Angeles, CA 90012

1 I, Leslie Klein, hereby declare as follows:

2 1. I am the debtor in the above-referenced case. The facts stated herein are within my personal
3 knowledge and I could testify competently to these facts.

4 2. I make this declaration in opposition to the Application(s) for Compensation by the Trustee
5 (Dock. No. 1060), by the Trustee's counsel (Dock. No. 1056), and by the Trustee's accountant (Dock.
6 No. 1062) (collectively, the "Applicants").

7 3. For the reasons stated herein, the Applicants' requests for fees should be denied until there is a
8 sufficient recovery by the estate to provide compensation to the legitimate creditors. I join the
9 opposition to the Applicants' request by Erica and Joseph Vago (Dock. No. 1087) on that point. The
10 Applicants' current fee requests would transfer every penny of the estate into the pockets of the
11 professionals, leaving nothing for the legitimate creditors. That is obviously inappropriate.

12 4. However, I make this declaration to remind the Court that, in fact, most of the funds currently
13 held by the estate should not even be distributed to the creditors (much less to Applicants) because
14 those funds are not properly estate assets.

15 5. Additionally, there is a significant amount of funds which the Trustee received but which has
16 since disappeared without an account, as set forth below. That money must also be accounted for
17 before the Applicants receive any distribution.

18 6. The Trustee currently claims to be holding just \$2.5 million. Of that money, approximately
19 \$2.25 million was provided by Life Capital Group, LLC ("LCG"), from the funds of life insurance
20 policies. Another approximately \$275,000 held by the Trustee is proceeds from the sale of my real
21 property on Poinsettia Place.

22 7. The approximately \$2.25 million from LCG consists of \$750,000 from the policy of Andrew
23 Gardner, and \$1.5 million from the policy of Eugene Kohn. However, that revenue is not estate
24 property.

25 8. From the \$750,000 from the policy of Andrew Gardner, \$500,000 is due to the beneficiaries
26 of the David Berger trust, which was a major investor in the Gardner policy. The remaining \$250,000
27 from the Gardner policy is due to the corporate entity of Leslie Klein & Associates, which
28 administered that money on behalf of other client to which the money is due.

1 9. From the \$1.5 million from the Eugene Kohn policy which the Trustee is holding, \$300,000 is
2 the property of Mr. Kohn's family, his wife and children, pursuant to the contract by which Mr.
3 Kohn's policy was originally assigned. Also, \$500,000 of that money is contractually due to Robert
4 and Esti Mermelstein based on their investment in the Kohn policy. Additionally, \$500,000 is the
5 property of Leslie Klein & Associates, to repay loans advanced to Andor Gestetner and for other
6 obligations incurred related to the Eugene Kohn policy.

7 10. There is also almost \$1 million which the Trustee received from the sale of other properties,
8 but which is now unaccounted for. The Trustee collected approximately \$800,000 from the sale of a
9 house in Oxnard, California, and collected another \$150,000 from the sale of a property in Palm
10 Springs. That money must be accounted for by the Trustee, his counsel and his accountant before any
11 distribution is made to those professionals.

12 I certify under penalty of perjury under the laws of the United States that the foregoing is true
13 and correct. Executed in Los Angeles, California, on June 1, 2025.

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15 /S/ LESLIE KLEIN
16 LESLIE KLEIN
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In re: LESLIE KLEIN
Debtor.

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Case No.: 2:23-bk-10990-NB

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 301 East Colorado Boulevard, Suite 520, Pasadena, California 91101.

A true and correct copy of the foregoing document described as "**Declaration of Debtor Leslie Klein In Opposition to Application for Compensation by Trustee and Counsel**" will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner indicated below:

I. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF") Pursuant to controlling General Order(s) and Local Bankruptcy Rule(s) ("LBR"), the foregoing document will be served by the court via NEF and hyperlink to the document. On June 2, 2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email address(es) indicated below:

[x] Service information continued on attached page.

II. SERVED BY U.S. MAIL OR OVERNIGHT MAIL (indicated method for each person or entity served): On June 2, 2025, I served the following person(s) and/or entity(ies) at the last known address(es) in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States Mail, first class, postage prepaid, and/or with an overnight mail service addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

[x] Service information continued on attached page.

In re: LESLIE KLEIN
Debtor.

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Case No.: 2:23-bk-10990-NB

I declare under penalty of perjury under the laws of the United States
of America that the foregoing is true and correct.

06/02/2025
Date

Jasper Pantaleon
Type Name

/s/ Jasper Pantaleon
Signature

**I. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC
FILING (NEF)":**

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II. SERVED BY UNITED STATES MAIL:

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